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Alcohol- and Drug-Free Mines: Policy, Prohibitions, Testing, Training, and Assistance

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Comment from Scott McCullough, McCullough Crushing

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General Comment

This proposed rule further proves that the Federal Government has absolutely no concept of the value of a dollar. With only 270 violations in 30 years and an average of 9 violations per year the Federal Government is going to implement a program that will cost the mining industry 16 million dollars in the first year alone. That is \$1,778,775.88 per violation. This, being done at a time of a failing economy and rising fuel cost, further burdening the mining industry. This proposed rule further shows the reckless disregard for fiscal responsibility by the United States Government and the Dept. of Labor specifically. It seems to me that MSHA hasn't received enough revenue for its present drug and alcohol regulations and is looking for new ways to increase it's funding revenue at the expense of an already over regulated industry.

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